

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

STEVEN SEGAL, NICK HAMMER, ROBIN)
HOUGDAHL, and TODD TERRY, on behalf of)
themselves and all other similarly situated)
Plaintiffs,) Civil Action No.: 11-CV-4521 (LBS)
v.)
RAYMOND BITAR; NELSON BURTNICK;)
FULL TILT POKER, LTD.; TILTWARE, LLC;)
VANTAGE, LTD; FILCO, LTD.; KOLYMA)
CORP. A.V.V.; POCKET KINGS LTD.;)
POCKET KINGS CONSULTING LTD.;)
RANSTON LTD.; MAIL MEDIA LTD.;)
HOWARD LEDERER; PHILLIP IVEY JR.;)
CHRISTOPHER FERGUSON; JOHNSON)
JUANDA; JENNIFER HARMAN-TRANIELLO;)
PHILLIP GORDON; ERICK LINDGREN;)
ERIK SEIDEL; ANDREW BLOCH; MIKE)
MATUSOW; GUS HANSON; ALLEN)
CUNNINGHAM; PATRICK ANTONIUS and)
JOHN DOES 1-100)
Defendant.)
)

**DEFENDANTS' NOTICE OF MOTION TO DISMISS
PLAINTIFFS' COMPLAINT FOR LACK OF PERSONAL JURISDICTION**

PLEASE TAKE NOTICE that Defendants JENNIFER TRANIELLO,¹ ALLEN CUNNINGHAM, and ERICK LINDGREN, respectfully submit their Motion to Dismiss Plaintiffs' Complaint for Lack of Personal Jurisdiction pursuant to Federal Rule of Civil Procedure 12(b)(2).

¹ In the Complaint, Plaintiffs refer to Ms. Traniello as "Jennifer Harman-Traniello" or "Harman." We refer to her herein as Ms. Traniello or "Traniello," which is her legal name.

The grounds for Defendants' Motion to Dismiss Plaintiffs' Complaint for Lack of Personal Jurisdiction are more fully set forth in the accompanying Memorandum of Law filed contemporaneously herewith.

Dated: August 19, 2011

Respectfully submitted,

/s/ A. Jeff Ifrah

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Howard Lederer; Chris Ferguson; Jennifer
Harman-Traniello; Erick Lindgren; Erik Seidel;
Andrew Bloch; Mike Matusow; and
Allen Cunningham*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of August, 2011, a copy of the foregoing Defendants' Notice of Motion of Dismiss Plaintiffs' Complaint for Lack of Personal Jurisdiction, Memorandum of Law in support thereof, and Proposed Order were sent via the ECF filing system and via email to:

Thomas H. Burt
Beth Landes
Gregory Nespole
Lawrence Kolker
WOLF HALDENSTEIN ADLER FREEMAN & HERZ LLP
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/s/ A. Jeff Ifrah

A. Jeff Ifrah